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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CELLINK CORP.

Plaintiff,

vs.

MANAFLEX LLC,

Defendant.

CASE NO. 4:23-cv-04231-HSG

**STIPULATION REGARDING  
EXTENSION OF TIME TO  
RESPOND TO FIRST AMENDED  
COMPLAINT; ORDER**

**[Civil L.R. 6-1, 6-2]**

Demand for Jury Trial

Complaint Filed: August 18, 2023

FAC Filed: November 22, 2024

1 Pursuant to Local Civil Rules 6-1 and 6-2, Plaintiff CelLink Corporation (“CelLink”) and  
2 Defendant Manaflex LLC (“Manaflex”) stipulate to extend Manaflex’s deadline for its response to  
3 the First Amended Complaint.

4 WHEREAS, on November 19, 2024, CelLink’s Motion for Leave to File Amended  
5 Complaint was granted by this Court;

6 WHEREAS, CelLink’s First Amended Complaint was filed and served on  
7 November 22, 2024;

8 WHEREAS, Manaflex’s response to the First Amended Complaint is due on  
9 December 18, 2024;

10 WHEREAS, this requested extension is warranted as Manaflex and its counsel anticipate  
11 formally undertaking representation of the two new individual defendants so each may accept  
12 service of the First Amended Complaint by December 18, 2024, which would calendar the new  
13 individual defendants’ respective First Amended Complaint responses due on January 8, 2025.

14 Anderson Decl. ¶ 4.

15 WHEREAS, it is in the interest of efficiency for all parties and the Court to have each  
16 Defendant respond on the same date. Anderson Decl. ¶ 5.

17 WHEREAS, there have been seven previous extensions of time in this case and only one  
18 extension of this deadline to respond to Plaintiff’s First Amended Complaint:

19 (1) a stipulated extension of time to respond to the complaint that was filed on  
20 September 11, 2023 and granted on September 12, 2023. Anderson Decl. ¶ 6.

21 (2) a stipulated extension of time for the Parties to file a Joint Case Management Statement  
22 and selecting an ADR process that was filed on November 7, 2023 and granted on  
23 November 8, 2023. *Id.*

24 (3) a stipulated extension of time to respond to counterclaims that was filed on  
25 November 27, 2023 and granted on November 28, 2023. *Id.*

26 (4) a stipulated extension of time to respond to counterclaims that was filed on  
27 June 12, 2024 and granted on June 12, 2024. *Id.*

(5) a stipulated request for an order modifying the Parties' briefing schedule related to Plaintiff's motion to dismiss Defendant's unfair competition counterclaim filed on July 17, 2024 and granted on July 18, 2024. *Id.*

(6) a stipulated request for an order modifying hearing schedule related to CelLink's Motion to File the First Amended Complaint filed on October 14, 2024 and granted on October 15, 2024. *Id.*

(7) a stipulated extension of time to respond to the first amended complaint that was filed on December 4, 2024 and granted on December 5, 2024. *Id.*

WHEREAS, the brief extension of time requested here would have no effect on any other scheduled deadlines for the case. Anderson Decl. ¶ 7.

WHEREAS, other than as set forth below, the parties agree that all other deadlines will remain in place.

**NOW THEREFORE**, subject to the Court's approval, it is hereby stipulated and agreed between CelLink and Manaflex, through their undersigned counsel, as follows:

1. Defendant Manaflex's time to file any response to the First Amended Complaint shall be extended to January 8, 2025.

**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

Dated: December 16, 2024

BOIES SCHILLER FLEXNER LLP

/s/ Alison L. Anderson

Alison L. Anderson

Eric J. Maurer

Beko Reblitz-Richardson

Joshua Y. Quaye

*Attorneys for Defendant Manaflex LLC*

1 Dated: December 16, 2024

/s/ Andrea Levenson

HAYNES BOONE

Jason Lao

Brian Kwok

Ken Parker

Andrea Levenson

*Attorneys for Plaintiff CellLink Corp.*

**ECF ATTESTATION**


I, Joshua Y. Quaye, am the ECF User whose ID and password are being used to file this Stipulation Regarding Extension of Time to Respond to Plaintiff's First Amended Complaint and [Proposed] Order. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Andrea Levenson, counsel for CelLink Corp., has concurred in this filing.

Dated: December 16, 2024

/s/ Joshua Y. Quaye  
Joshua Y. Quaye

**PURSUANT TO STIPULATION, IT IS SO ORDERED:**

Dated: 12/17/2024

  
The Honorable Haywood S. Gilliam, Jr.  
United States District Judge